

1 [Submitting Counsel on Signature Page]  
2  
3  
4  
5  
6  
7  
8

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

11 IN RE: SOCIAL MEDIA ADOLESCENT  
12 ADDICTION/PERSONAL INJURY  
13 PRODUCTS LIABILITY LITIGATION

MDL No. 3047

Case No. 4:22-MD-03047-YGR

14 \_\_\_\_\_  
15 This Document Relates to:  
16

ALL ACTIONS  
17 \_\_\_\_\_  
18

**JOINT STIPULATION AND [PROPOSED]  
ORDER REQUESTING ADDITIONAL  
TIME TO FILE A JOINT STATUS REPORT  
REGARDING FORENSIC IMAGING AND  
DEVICE DATA**

Hon. Yvonne Gonzalez Rogers  
Hon. Peter H. Kang

1 Pursuant to Civil Local Rules 6-1(b) and 6-2, the Parties, through their undersigned counsel,  
2 hereby stipulate and respectfully request that the Court extend the deadline for Plaintiffs and  
3 Defendants provide the Court a joint status report on forensic imaging and device data from  
4 Plaintiffs' devices. The parties declare in support of this request:

5 1. On September 19, the Parties had an initial meeting with their respective third-party  
6 vendors to discuss the categories and location of data sought from Main Devices, and the requested  
7 format for production of the agreed upon data.

8 2. On September 20, 2024 the Parties submitted a Joint Status Report Regarding  
9 Forensic Imaging and Device Data to the Court. In that report, the Parties stated they would provide  
10 a supplemental report to the Court on September 27, 2024 unless the Court directs otherwise.

11 3. Since September 19, the Parties have continued to discuss the categories and  
12 location of data sought from Main Devices, and the requested format for production of the agreed  
13 upon data.

14 4. The Parties mutually agree that they would benefit from more time to continue their  
15 discussions before providing a joint status report to the Court.

16 5. The Parties anticipate that extension until October 2 to submit Joint Status Report  
17 Regarding Forensic Imaging and Device Data afford adequate time for such discussions.

18 6. Extending this deadline will not affect any other deadline affixed by the Court.

19 7. This is the first request to extend this deadline.

20 THEREFORE, pursuant to Local Rules 6-1(b) and 6-2, the parties stipulate and respectfully  
21 request that the Court extend the deadline for the parties to submit a Joint Status Report Regarding  
22 Forensic Imaging and Device Data to October 2, 2024.

23  
24 **IT IS SO ORDERED,**

25 Dated:

26  
27 PETER H. KANG  
UNITED STATES MAGISTRATE JUDGE  
28

1 IT IS SO STIPULATED AND AGREED.

2 Dated: September 27, 2024

3 Respectfully submitted,

4 /s/ Lexi J. Hazam

5 LEXI J. HAZAM  
6 **LIEFF CABRASER HEIMANN & BERNSTEIN, LLP**  
7 275 Battery Street, 29<sup>th</sup> Floor  
San Francisco, CA 94111-3339  
Telephone: 415-956-1000  
lhazam@lchb.com

8 PREVIN WARREN  
9 **MOTLEY RICE LLC**  
10 401 9th Street NW Suite 630  
Washington DC 20004  
Telephone: 202-386-9610  
pwarren@motleyrice.com

11 Co-Lead Counsel

12 CHRISTOPHER A. SEEGER  
13 **SEEGER WEISS, LLP**  
14 55 Challenger Road, 6<sup>th</sup> floor  
Ridgefield Park, NJ 07660  
Telephone: 973-639-9100  
Facsimile: 973-679-8656  
cseeger@seegerweiss.com

15 Counsel to Co-Lead Counsel and Settlement Counsel

16 JENNIE LEE ANDERSON  
17 **ANDRUS ANDERSON, LLP**  
18 155 Montgomery Street, Suite 900  
San Francisco, CA 94104  
Telephone: 415-986-1400  
jennie@andrusanderson.com

19 Liaison Counsel

20 JOSEPH G. VANZANDT  
21 **BEASLEY ALLEN CROW METHVIN PORTIS**  
22 **& MILES, P.C.**  
23 234 Commerce Street  
Montgomery, AL 36103  
Telephone: 334-269-2343  
joseph.vanzandt@beasleyallen.com

24 EMILY C. JEFFCOTT  
25 **MORGAN & MORGAN**  
26 220 W. Garden Street, 9<sup>th</sup> Floor  
Pensacola, FL 32502

1 Telephone: 850-316-9100  
2 ejeffcott@forthepeople.com

3 Federal/State Liaison Counsel

4 MATTHEW BERGMAN  
5 **SOCIAL MEDIA VICTIMS LAW CENTER**  
6 821 Second Avenue, Suite 2100  
Seattle, WA 98104  
Telephone: 206-741-4862  
matt@socialmediavictims.org

7 JAMES J. BILSBORROW  
8 **WEITZ & LUXENBERG, PC**  
9 700 Broadway  
New York, NY 10003  
Telephone: 212-558-5500  
Facsimile: 212-344-5461  
jbilsborrow@weitzlux.com

11 PAIGE BOLDT  
12 **WATTS GUERRA LLP**  
13 4 Dominion Drive, Bldg. 3, Suite 100  
San Antonio, TX 78257  
Telephone: 210-448-0500  
PBoldt@WattsGuerra.com

15 THOMAS P. CARTMELL  
16 **WAGSTAFF & CARTMELL LLP**  
17 4740 Grand Avenue, Suite 300  
Kansas City, MO 64112  
Telephone: 816-701 1100  
tcartmell@wcllp.com

18 JAYNE CONROY  
19 **SIMMONS HANLY CONROY, LLC**  
20 112 Madison Ave, 7<sup>th</sup> Floor  
New York, NY 10016  
Telephone: 917-882-5522  
jconroy@simmonsfirm.com

22 SARAH EMERY  
23 **HENDY JOHNSON VAUGHN EMERY, PSC**  
24 2380 Grandview Drive  
Ft. Mitchell, KY 41017  
Telephone: 888-606-5297  
semery@justicestartshere.com

25 CARRIE GOLDBERG  
26 **C.A. GOLDBERG, PLLC**  
27 16 Court St.  
Brooklyn, NY 11241  
Telephone: (646) 666-8908  
carrie@cagoldberglaw.com

1 RONALD E. JOHNSON, JR.  
2 **HENDY JOHNSON VAUGHN EMERY, PSC**  
3 600 West Main Street, Suite 100  
4 Louisville, KY 40202  
Telephone: 859-578-4444  
rjohnson@justicestartshere.com

5 SIN-TING MARY LIU  
6 **AYLSTOCK WITKIN KREIS & OVERHOLTZ,  
PLLC**  
7 17 East Main Street, Suite 200  
Pensacola, FL 32502  
Telephone: 510-698-9566  
mliu@awkolaw.com

9 JAMES MARSH  
10 **MARSH LAW FIRM PLLC**  
11 31 Hudson Yards, 11th floor  
New York, NY 10001-2170  
Telephone: 212-372-3030  
jamesmarsh@marshlaw.com

12 ANDRE MURA  
13 **GIBBS LAW GROUP, LLP**  
14 1111 Broadway, Suite 2100  
Oakland, CA 94607  
Telephone: 510-350-9717  
amm@classlawgroup.com

16 HILLARY NAPPI  
17 **HACH & ROSE LLP**  
18 112 Madison Avenue, 10th Floor  
New York, New York 10016  
Telephone: 212.213.8311  
hnappi@hrsclaw.com

20 EMMIE PAULOS  
21 **LEVIN PAPANTONIO RAFFERTY**  
22 316 South Baylen Street, Suite 600  
Pensacola, FL 32502  
Telephone: 850-435-7107  
epaulos@levinlaw.com

23 RUTH THI RIZKALLA  
24 **THE CARLSON LAW FIRM, P.C.**  
25 1500 Rosecrans Ave., Ste. 500  
Manhattan Beach, CA 90266  
Telephone: 415-308-1915  
rrizkalla@carlsonattorneys.com

27 ROLAND TELLIS  
DAVID FERNANDES  
**BARON & BUDD, P.C.**

1                   15910 Ventura Boulevard, Suite 1600  
 2                   Encino, CA 91436  
 3                   Telephone: (818) 839-2333  
 4                   Facsimile: (818) 986-9698  
 5                   rtellis@baronbudd.com  
 6                   dfernandes@baronbudd.com

7  
 8                   **ALEXANDRA WALSH**  
 9                   **WALSH LAW**  
 10                  1050 Connecticut Ave, NW, Suite 500  
 11                  Washington D.C. 20036  
 12                  Telephone: 202-780-3014  
 13                  awalsh@alexwalshlaw.com

14  
 15                  **MICHAEL M. WEINKOWITZ**  
 16                  **LEVIN SEDRAN & BERMAN, LLP**  
 17                  510 Walnut Street, Suite 500  
 18                  Philadelphia, PA 19106  
 19                  Telephone: 215-592-1500  
 20                  mweinkowitz@lfsbalw.com

21  
 22                  **MELISSA YEATES**  
 23                  **JOSEPH H. MELTZER**  
 24                  **KESSLER TOPAZ MELTZER & CHECK, LLP**  
 25                  280 King of Prussia Road  
 26                  Radnor, PA 19087  
 27                  Telephone: 610-667-7706  
 28                  myeates@ktmc.com  
 29                  jmeltzer@ktmc.com

30  
 31                  **DIANDRA "FU" DEBROSSE ZIMMERMANN**  
 32                  **DICELLO LEVITT**  
 33                  505 20<sup>th</sup> St North, Suite 1500  
 34                  Birmingham, Alabama 35203  
 35                  Telephone: 205.855.5700  
 36                  fu@dicelloselevitt.com

37  
 38                  *Attorneys for Plaintiffs*

39  
 40                  **FAEGRE DRINKER BIDDLE & REATH LLP**

41  
 42                  */s/ Andrea R. Pierson*  
 43                  Andrea Roberts Pierson, *pro hac vice*  
 44                  andrea.pierson@faegredrinker.com  
 45                  Amy Fiterman, *pro hac vice*  
 46                  amy.fiterman@faegredrinker.com  
 47                  Faegre Drinker Biddle & Reath LLP  
 48                  300 N. Meridian Street, Suite 2500  
 49                  Indianapolis, IN 46204  
 50                  Telephone: + 1 (317) 237-0300  
 51                  Facsimile: +1 (317) 237-1000

1                   **KING & SPALDING LLP**

2                   /s/ Geoffrey M. Drake  
3                   Geoffrey M. Drake, *pro hac vice*  
4                   gdrake@kslaw.com  
5                   David Mattern, *pro hac vice*  
6                   dmattern@kslaw.com  
7                   King & Spalding LLP  
8                   1180 Peachtree Street, NE, Suite 1600  
9                   Atlanta, GA 30309  
10                  Telephone: + 1 (404) 572-4600  
11                  Facsimile: + 1 (404) 572-5100

12                  Attorneys for Defendants  
13                  TIKTOK INC., BYTEDANCE INC., BYTEDANCE  
14                  LTD., TIKTOK LTD., and TIKTOK, LLC

15                  **ATTESTATION**

16                  I, Andrea Roberts Pierson, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the  
17                  concurrence to the filing of this document has been obtained from each signatory hereto.

18                  Dated: September 27, 2024

19                  /s/ Andrea R. Pierson  
20                  Andrea Roberts Pierson

21                  Attorneys for Defendants  
22                  TIKTOK INC., BYTEDANCE INC.,  
23                  BYTEDANCE LTD., TIKTOK LTD., and  
24                  TIKTOK, LLC